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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE	§	
	§	
TROPHY HOSPITALITY, LLC.	§	Case no. 21-40512-11
	§	
DEBTOR	§	

AMENDED JOINT MOTION FOR APPROVAL OF AGREEMENT PURSUANT TO  
BANKRUPTCY RULE 4001(d)

**NO HEARING WILL BE CONDUCTED HEREIN UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, 660 NORTH CENTRAL EXPRESSWAY, 3<sup>RD</sup> FLOOR, PLANO, TEXAS 75074, BEFORE 5:00 O'CLOCK P.M., ON JULY 21, 2021, WHICH IS FOURTEEN (14) DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK. A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE BRENDA T. RHOADES:

COMES NOW, Trophy Hospitality, LLC (“Debtor”) and the Blue Star Frisco Retail, LLC (“Blue Star”) and files this their Joint Motion for Approval of Stipulation Assuming Lease and Resolving Motion for Relief Pursuant to Bankruptcy Rule 4001(d) and in support thereof, would respectfully show unto the Court as follows:

1. Debtor filed this case under Chapter 11 on April 8, 2021.
2. The Debtor and Blue Star have reached an Agreement for the Debtor’s Assumption of its Lease with Blue Star and Resolving Pending Motion for Relief. The Agreement is in the form of a Joint Stipulation and is attached hereto as Exhibit A.
3. Pursuant to Bankruptcy Rule 4001(d) you have 14 days to Object to the entry of the attached Agreement.

WHEREFORE, PREMISES CONSIDERED, the Debtors and Blue Star respectfully request the Court approve this Joint Motion and for such other and further relief, in law or equity, to which they may show themselves justly entitled.

Respectfully submitted,

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/s/ Eric Liepins  
ERIC A. LIEPINS, SBN 12338110

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Motion was forwarded to U. S. Trustee, all those persons requesting notice, and all creditors of the estate, via U.S. Mail, this 8<sup>th</sup> day of July 2021.

/s/ Eric Liepins  
ERIC A. LIEPINS